

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JONATHAN MEROLLA,

Plaintiff,

vs.

**COUNTY OF NASSAU, NASSAU
COUNTY POLICE DEPARTMENT,
DETECTIVE JAMES B. BRODIE,
DETECTIVE SALERNO, DETECTIVE
NAPALITANO-FERRO, AND
LIEUTENANT EDWARD V.
SHANAHAN,**

Defendants.

COMPLAINT

Index No. 19-4504

Plaintiff JONATHAN MEROLLA, by his attorney at RICKNER PLLC, complaining of the defendants, respectfully alleges the following:

PRELIMINARY STATEMENT

1. Plaintiff Jonathan Merolla, brings this action for compensatory damages, punitive damages, and attorney's fees pursuant to the statutory and common law of the State of New York for assault, battery, and false imprisonment; pursuant to 42 U.S.C. § 1983 and 42 U.S.C. § 1988 for violations of his rights under the Constitution of the United States of America; and under the New York State Constitution.

2. On May 8, 2018, at approximately 10 p.m., Jonathan Merolla was arrested in his residence at 764 Lenore Lane, Elmont, New York, without a warrant or any justification, by the individual officers named here as well as other unknown officers of the Nassau Police Department. The sole reason for the arrest was that Mr. Merolla failed to help the police arrest